



NASA Procedural Requirements

COMPLIANCE IS MANDATORY**NPR 8553.1A**Effective Date: March 22,
2005Expiration Date: March 22,
2010[Printable Format \(PDF\)](#)**Subject: NASA Environmental Management System (EMS) w/Change 2 (04/26/2006)****Responsible Office: Environmental Management Division**

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APPENDIX Z. Part 3. NASA Environmental Management System Checklist

Z3.1 Introduction and Background

- a. Part 3. NASA Environmental Management System Checklist (Part 3) is intended to serve as general guidance to NASA Centers (and their Component Facilities to which this requirement applies) on conformance with self-declaration related requirements of NPR 8553.1 and Executive Order 13148 (the EO).
- b. The EO requirements stipulate that for each appropriate facility an EMS must be implemented by December 31, 2005 and subsequently maintained. Federal agencies can satisfy this requirement with external EMS recognition programs or self-declaration. NASA Headquarters, all NASA Centers, and a number of NASA Component Facilities have been identified as appropriate facilities requiring an EMS. The NASA Headquarters Environmental Management Division maintains the current list of appropriate facilities.
- c. The Office of the Federal Environmental Executive (OFEE) and the Executive Order 13148 Interagency Work Group¹⁵ established EMS self-declaration requirements to ensure the credibility of self-declarations of EMS for appropriate facilities.

¹⁵ Executive Order 13148, Greening the Government Through Leadership in Environmental Management Sec. 306. "Interagency Environmental Leadership Workgroup. Within 4 months of the date of this order, EPA shall convene and chair an Interagency Environmental Leadership Workgroup (the Workgroup) with senior-level representatives from all executive agencies and other interested independent Government agencies affected by this order. The Workgroup shall develop policies and guidance required by this order and member agencies shall facilitate implementation of the requirements of this order in their respective agencies. Workgroup members shall coordinate with their Agency Environmental Executive (AEE) designated under section 301(d) of Executive Order 13101 and may request the assistance of their AEE in resolving issues that may arise among members in developing policies and guidance related to this order. If the AEEs are unable to resolve the issues, they may request the assistance of the Chair of the Council on Environmental Quality (CEQ)".

Z3.2 EMS Self-Declaration Drivers

- a. Requirements for EMS self-declaration originate from NPR 8553.1 as driven by the EO.
- b. NPR 8553.1 related requirements include the process for self-declaration and individual responsibilities for Center Directors (or, in the case of a Component Facility a designee may be appointed) and Center EMS Representatives. The process is driven by requirements articulated in the EMS Self-Declaration Protocol¹⁶ and the Clarification of Self-Declaration Terms. ¹⁷ Part 3, Attachment Z3.1 provides the text of the Self-Declaration Protocol. Part 3, Attachment Z3.2 provides the text of the Clarification of Self-Declaration

Terms.

16 Environmental Management Systems, Agency Self-Declaration Protocol for Appropriate Federal Facilities, Final Version September 10, 2003, transmitted under cover from the Office of the Federal Environmental Executive, January 27, 2004.

17 Clarification of Terms Used for Self Declaration of Conformance to the EO 13148 Requirement for EMS Implementation, issued by USEPA, Federal Facilities Enforcement Office, October 4, 2004.

Z3.2.1 EMS Self-Declaration Protocol

- a. The EMS Self-Declaration Protocol was developed by the Executive Order 13148 Interagency Work Group, finalized on September 10, 2003, and issued by OFEE in January 2004. It requires that federal agencies and their facilities or organizations ensure credibility in their process to self-declare conformance with their selected EMS. To do this, agencies must develop a process that provides for effective and objective assessment of their EMS in a manner that (1) not only ensures their EMS is conformant, but (2) also is designed for ongoing evaluation and continual improvement. Such a process must not only verify that appropriate EMS documentation is developed, but must also affirm that the facility or organization is actually implementing its EMS as defined in its documentation and is doing what it says it is doing. This process must also include the degree of transparency and objectivity necessary to make the self-declaration credible.

Z3.2.2 Clarification of Self-Declaration Terms

- a. The content of the clarification of self-declaration terms is specific to the degree of independence of auditors.
- b. When reporting self-declaration, facilities or organizations are requested to provide the basis for the conclusion regarding self-declaration. That is, whether the declaration is made based on an internal evaluation from a first party audit, an independent review from an external, second party audit or an independent review from an external, third party audit, or a combination of the above.
- c. Thus as a part of self-declaration statements, the basis for the declaration should be included.
- d. The clarification of terms specifically notes that requirements are driven by "each agency's self-declaration protocol". NASA has defined its criteria for self-declaration within the applicable sections of NPR 8553.1 and specifically the NPR's definitions (Chapter 1.2) for: "Independent Self-Declaration Assessment", and "Self-Declaration".
- e. NASA has determined that annual self-declaration is required and that every third year, self-declaration must be based on an independent self-declaration assessment (second or third party).
- f. "Internal Evaluations: First party audits" are conducted by participants within the scope of the EMS. A Center conducted internal EMS review would be considered a first party audit.
- g. "Independent Reviews: Second party audits" are conducted by reviewers from outside the EMS scope. The EMS portion of a NASA Headquarters led environmental functional review (EFR) is an example a second party audit.
- h. For NASA Centers, the key factor in a second party audit is that the reviewers do not otherwise work at or have any responsibility associated with the parts of the Center being reviewed. For example, a NASA on-site contractor that does not provide general environmental support services to the Environmental Office at a Center could provide a second party independent review, of the parts of the Center they otherwise have no contact with.
- i. "Independent Reviews: Third party audits" are conducted by a third party such as an independent ISO 14001 Registrar. Third party audits are not required by the EO for self-declaration. An external contractor retained for the express purpose of providing EMS audit services would be considered a third party. See also Section Z3.5 for discussion of external recognition programs.
- j. Combinations of First Second and Third party audits may also occur. The NASA process of internal EMS reviews and a Headquarters led EFR every third year is an example of a combined approach. ISO 14001 registration audits (which cover the scope of ISO 14001) augmented by internal EMS reviews that examine the portions of NPR 8553.1 which are beyond ISO 14001 is a combined approach.

Z3.3 EMS Self-Declaration Process

Z3.3.1 Center Director

- a. Center Directors are responsible for: "when applicable, making an annual EMS self-declaration that the Center EMS conforms to applicable requirements of this NPR, is in place, and is viable".
- b. Center Directors in part will rely on the EMS Representative, via their assigned responsibilities, in order to

make this statement. As Center Directors, as part of the management review process, are responsible for periodically reviewing the Center EMS and annual EMS reviews are required, these reviews and self-declarations may be (at the discretion of the Center) conducted as an integrated process.

- c. Center Directors should be involved in this self-declaration reporting process described in Section Z3.3.2 below, to the extent needed to allow them to make an informed assessment that the Center EMS is in place and viable, including conformance to: the requirements of NPR 8553.1, and Center defined EMS requirements. While Section Z3.4 below provides guidance, Centers and Center Directors are free to determine what, an "in place and viable" EMS is.
- d. To complete the annual self-declaration, the Center Director (or possibly their designee at a Component Facility) should sign a statement including language similar to the following:

"As the Director (insert correct Position / Title if on behalf of a Component Facility) of the (NASA Center), I have determined that (insert appropriate facility name[s] as listed by NASA Environmental Management Division for reporting purposes to EPA) has an environmental management system(s) that is in place and is viable. Furthermore, I confirm that I, and senior management, have reviewed the environmental management system for conformance with NPR 8553.1 and Center EMS requirements."

- e. Attachment Z3.3 below provides one possible format for the actual self-declaration. A Center Director could also choose to issue a signed statement similar to the above text in another format, (e.g., memo to the record, statement in the meeting minutes, etc.).
- f. Note: Senior management is referenced in the statement above, because under NPR 8553.1, Chapter 5.4.3.d, the results of EMS reviews and independent self-declaration assessments are to be provided to Center Senior Management.
- g. Further, as per Section Z3.2.2 above, the statement should including language similar to the following.

"The determination that the environmental management system(s) is in place and viable, has included consideration of the results of the following assessment(s) (insert as appropriate, the dates of the most recent independent self-declaration assessment or most recent internal EMS review(s))."

- h. Signed annual statements are EMS records. They will be requested during environmental functional reviews as well as potentially under annual Executive Order 13148 reporting. Furthermore, external parties may request copies as evidence that Federal facilities are meeting the requirements of the Executive Order.

Z3.3.2 Self-Declaration Reporting

- a. It is recommended that Centers develop a procedure or process that outlines the topics that will be covered in the process of reporting on if the Center meets self-declaration requirements to senior management and the Center director.
- b. The self-declaration reporting process may include:
 - 1. Information to be assembled and provided by the EMS Representative.
 - 2. If the Center EMS Core Team participates in or advises in the process.
 - 3. Center Management review of information prior to reporting to the Center Director.
 - 4. How the reporting will enable the Center Director to come to a conclusion on EMS status and viability.
- c. The information to be relayed via the reporting process may include:
 - 1. The results of the most recent self-declaration assessment.
 - 2. Status of findings under previous: self-declaration assessments, EMS reviews, or environmental functional reviews.
 - 3. Other information assembled to assist with determining if the EMS is in place and viable (see Section Z3.4 below).

Z3.3.3 Center EMS Representative

- a. Center EMS representatives are responsible for reporting to the Center Director on: the results of Center-led annual EMS reviews, independent self-declaration assessments, and the status and viability of the Center EMS. Self-declaration assessments and EMS reviews are to be provided to Center Senior Management as well.
- b. Reporting noted above might include a briefing on the results of the most recent independent self-declaration assessment or internal EMS review, such as, strengths and weaknesses in the EMS and opportunities for improvement. A report may (if appropriate) include an actual recommendation (with justification) as to if the

EMS is "in place and viable".

Z3.4 Determination that the EMS is in Place and Viable

- a. The terms "in place" and "viable" are not defined terms in the NASA EMS. This Sub-chapter discusses potential strategies an EMS Representative and Center Director could use to reach a conclusion as to if the Center EMS is in place and viable.
- b. For guidance on the process and practice of conducting EMS reviews and use of the environmental functional review checklist, see Appendix Z Part 2. Section Z3.5 below discusses EMS reviews and independent assessments as they apply to self-declaration.

Z3.4.1 An "in place" EMS

- a. For all of the clauses of NPR 8553.1 (roles, responsibilities and defined requirements), for an EMS to be "in place", the last time conformance was assessed, the assessor should have indicated that the clause was satisfied. In general, the results of reviews and independent assessments of the EMS are a good indicator that an EMS is "in place".
- b. If the internal review or independent assessment notes previously unidentified opportunities for continual improvement under a clause, provided that a plan of action to effect change is in place, this should not be considered as something that negates a finding that an EMS is "in place".
- c. Conversely, if previous reviews or independent assessments have identified that a clause was not satisfied, and that agreed actions to resolve this where not completed, then the EMS is not in place.
- d. The "stop light" system used during environmental functional reviews is one indicator process for assessing if an EMS is in place. Consider each of the "17 elements" of the EMS as a program area and apply the following criteria.
 1. Healthy (green) -- good program, on-track in meeting requirements.
 2. Needs improvement (yellow) -- program does not meet requirements in one or more areas.
 3. Requires immediate attention (red) -- program does not meet major requirements in more than one area.
- e. Using this indicator process, an "in place" EMS should be green for all 17 EMS elements. A small number of areas could be yellow and the EMS could still be considered "in place", if:
 1. The areas now yellow have previously been identified as green, and due to changing situations (examples: re-organization of management structure has changed Center roles and responsibilities, or a new program has increased planned activity affecting several aspects), required changes are not yet complete, and
 2. The affected areas of the Center were aware of the deficiencies prior to the most recent review or independent assessment, and were in the process of corrective action (for the above examples: affected EMS documentation has been scheduled for review and revision, the affected aspects and aspect prioritization are scheduled to be reviewed prior to commencement of increased activity).

Z3.4.2 A "Viable" EMS

- a. For an EMS to be "viable" a determination should be made that the "elements" of the EMS work as a system to achieve improvements in environmental performance. This determination is more subjective than the in place determination. To assist in justifying determinations of viability, Centers should document what indicators of viability were considered.
- b. A simple way to consider if the EMS is viable is to consider if it is a "living" system that evolves with changing circumstances. Does the EMS evolve and improve based on its own internal processes, and checks and balances, as opposed to only when external influences (like EFRs or other independent reviews) are considered. An EMS that exists in a static or steady state over repeated continuous improvement cycles, is not evolving.
- c. Potential indicators of viability include:
 1. On an annual basis, a percentage of EMS documentation is proactively reviewed and as needed revised, as opposed to routinely waiting until near expiration deadlines before review.
 2. The EMS has assisted in the identification and subsequent improved management of environmental aspects that had not previously been identified as requiring improved management.
 3. Plans for future changes in activities at the Center were proactively brought to the attention of the environmental office, and affected aspects and their priority levels were reviewed.

4. Changes in legal or other requirements have been identified, and were appropriate subsequent consequences to operations identified and required changes in practices put in place.
 5. The Center periodically checks to see if operational staff are aware of what components of the operational controls are in place to ensure compliance with legal or other requirements. Note: Being able to recite a defined clause from a regulation is of less importance than, understanding that a specific work practice is required by law.
 6. The majority of objectives and targets were met on schedule.
 7. Environmental management programs are periodically reviewed and revised (as well as work items under the programs) to ensure they remain relevant, progress towards their implementation is tracked. This also applies to management controls in place to ensure aspects do not become high priority.
 8. The focus of training and communication programs has been evolving (based on the results of past EMS reviews and monitoring and measurement activities that have identified areas for improvement).
 9. Review of communication with external parties has identified changes in stakeholder issues and perceptions over time, which has been considered in the prioritization of aspects.
 10. Review of operational controls is conducted jointly by authors and users, in order to ensure they remain relevant and practical.
 11. The results of recent emergency preparedness exercises were used to evaluate and ensure that the potential environmental consequences and used in the aspect prioritization remain valid.
 12. Monitoring and measurement activities are periodically reviewed and have been tied into corrective and preventive action processes at regular intervals, and not just prior to annual EMS reviews.
 13. The majority of EMS reviews and resulting corrective actions and changes in the EMS are completed as planned and well in advance of the next EMS review.
 14. Improvement in Center level data for NASA metrics required under NPR 8553.1.
 15. Improvement in Center internal EMS metrics.
- d. Not all of the above indicators need to be present for an EMS to be viable, but if converse situations for the majority have been identified during ongoing operations or during an EMS review or independent assessment, then the viability of the EMS would be questionable. Centers should consider developing a list of viability indicators that will be tracked and define as a part of the reporting processes in NPR 8553.1 Chapter 4.3.2 determine how these will be reported up to the Center Director.
 - e. In recognition of the potential for integration of the process for Center self-declaration and management review processes, consider the recommended EMS management review elements below (from ISO 14004:2004¹⁸) when making choices in what is reported to management and the Center Director to assist in making a determination of viability.

18 ISO 14004: Environmental Management Systems - General Guidelines on Principles, Systems and Support Techniques, International Organization for Standardization (ISO), 2004.

"Inputs to the management review may include:

- a. results of internal audits and evaluations of compliance with applicable legal requirements and with other requirements to which the organization subscribes,
- b. communication from external interested parties, including complaints,
- c. the environmental performance of the organization,
- d. the extent to which objectives and targets have been met,
- e. status of corrective and preventive actions,
- f. follow-up actions from previous management reviews,
- g. changing circumstances, including
 1. changes in the organization's products, activities and services,
 2. results of the evaluation of environmental aspects from planned or new developments,
 3. changes in applicable legal requirements and other requirements to which the organization subscribes,
 4. the views of interested parties,
 5. advances in science and technology, and
 6. lessons learned from emergency situations and accidents,

- h. recommendations for improvement."

Z3.5 EMS Reviews and Assessments

Z3.5.1 EMS Reviews

- a. Annual internal EMS reviews are required at all NASA Centers in non-EFR years. For self-declaring Centers this is also true. The key difference is that the EFR checklist must be used for internal EMS reviews at self-declaring Centers.
- b. For all Centers, the internal EMS review process must cover all EMS elements for all applicable operating areas, over a 3-year period. A Center cannot wait for an EFR to cover some of the EMS elements. Therefore, if the EFR is to be the only EMS review or assessment activity at the Center that year, the entire EMS in all applicable operating areas will need to be reviewed the other 2 years.
- c. The Center does need to determine which of the EMS elements apply in its different operating areas in order to assess them as appropriate. While all "17 elements" can be expected to apply to the Center environmental office, the process of setting objectives and targets for example, may not apply across all operating units, while the programs to achieve the objectives and targets could be restricted to the areas of the Center expected to participate.
- d. There may be times where the internal EMS review process should be undertaken at a higher frequency. For example: if a review in one year identifies an area where a corrective action is under way or continual improvement activities were under way, consideration should be given to returning the following year to assess progress. Areas with ongoing, periodic or marginal conformance should be considered for a higher review frequency.
- e. Centers should strive for objectivity throughout the EMS review process in order to obtain the greatest possible benefit from each review.

Z3.5.2 Independent Self-Declaration Assessments

- a. Independent self-declaration assessments are required every third year and can consist of the EMS component of a Headquarters EFR.
- b. NPR 8553.1 Chapter 1.2 includes NASA's definition of independent self-declaration assessment.

"An assessment of conformance of a Center's EMS to the defined criteria of this NPR by individuals without direct responsibility for the activities being assessed."
- c. This definition does not preclude the use of internal Center staff to assess the Center EMS, provided that independence can be demonstrated and that there is no direct responsibility for the activities being assessed.
- d. If a Center conducts an independent self-declaration assessment other than a Headquarters EFR, the means by which independence and a lack of direct responsibility is achieved should be documented.
- e. Section Z2.8 of Appendix Z, Part 2 focuses on self-declaring Centers. Section Z2.8 is primarily meant for use during independent self-declaration assessments including Headquarters led EFRs, and is made available as information for Centers to understand how an EFR will evaluate self-declaration activities.

Z3.6 External EMS Recognition Programs

- a. NPR 8553.1 stipulates that Centers may choose to participate in an external EMS recognition program or self-declare. The NPR definition of an "External EMS Recognition Program" identifies acceptable programs.
- b. If a Center wishes to participate in a program not listed, it should consult with the NASA Environmental Management Division as to if the program is acceptable. The NPR defines an "Acceptable State-Sponsored EMS Recognition Program" and references self-declaration requirements as the benchmark.

Part 3 Attachment Z3.1. Agency Self-Declaration Protocol for Appropriate Federal Facilities

This Attachment provides the content of the Environmental Management Systems, Agency Self-Declaration Protocol for Appropriate Federal Facilities, as issued by the Office of the Federal Environmental Executive, Final Version dated, September 10, 2003.

Introduction and Purpose:

The process used by federal agencies and their facilities or organizations to self-declare conformance with their

selected environmental management systems (EMS) must ensure credibility. In order to meet this goal, agencies must develop a process that provides for effective and objective assessment of these systems in a manner that not only ensures the system is conformant, but is also designed for ongoing evaluation and continual improvement. Such a process must not only verify that appropriate documentation is developed, but affirm that the facility or organization is actually implementing their EMS as defined in their documentation and doing what they say they are doing. This process must also include the degree of transparency and objectivity necessary to make the self-declaration credible.

This protocol outlines procedures for federal agencies developing processes that will ensure the credibility of self-declaration of EMS for their appropriate facilities as set forth in Executive Order 13148. Specifically, this protocol is designed to satisfy the following principles:

1. Result in accurate and reliable information on federal facilities' progress as they adopt improved business practices associated with EMS implementation.
2. Focus responsibility for initial EMS verification and on-going quality assurance at the agency / bureau level.
3. Provide agencies / bureaus flexibility to implement EMS in ways that support their overall public mission.
4. Provide an independent basis for verifying the status of a facility or organization EMS, and appropriately communicating that status to internal and external stakeholders.
5. Ensure that system verification is more than a documentation review, and that the effectiveness of implementation is also reviewed.
6. Use existing EMS elements where possible so that self-declaration becomes an integral part of the organization's EMS.

3.1. Protocol:

Agencies / bureaus shall direct their facilities or organizations to use one or more EMS evaluation guide(s) in conducting EMS self-declarations. Examples of evaluation guides are included in:

- Appendix A, The Global Environmental Management Initiative (GEMI) National Aeronautics and Space Administration "ISO 14001 Environmental Management System Self-Assessment Checklist" [Hotlink title text to document]
- Appendix B, "Oregon Green Permits Program Guide -- Attachment B: EMS Description and References." [Hotlink title text to document]
- Appendix C, The National Aeronautics and Space Administration's "Environmental Functional Review Checklist." [Hotlink title text to document]

1. In directing use of the selected evaluation guide, agencies / bureaus shall establish a procedure including the following:
 - a. direction on the use of the chosen evaluation guide(s).
 - b. direction on the frequency of self-declaration internal evaluations; the frequency of agency / bureau independent reviews, makeup of the independent review team (e.g., Headquarters, other facility, other agency, or contractor), and qualifications of independent reviewers, a requirement for facility or organization management to make a self-declaration statement that the EMS is in place when that conclusion is reached.
 - c. direction on documenting and using the results of EMS evaluations. This shall include steps for acknowledging adequate facility EMSs, follow-up actions to address inadequacies in the EMSs, and reporting results of evaluations for inclusion in agency-wide annual EMS reviews.
 - d. a schedule for reviewing agency / bureau EMS Self-Declaration Procedures. This review shall consider changes in agency / bureau programs and missions when appropriate but on a schedule that does not exceed five years. This is designed to allow a phased approach and continual improvement. An example of an agency EMS Self-Declaration Procedure is included in Appendix D, The National Aeronautics and Space Administration's "Environmental Functional Review Standard Operating Procedure." [Hotlink title text to document]
2. Agencies / bureaus shall communicate their choice of guide(s) and procedures described above in accordance with their internal and external EMS communication procedures.
3. Agencies / bureaus shall establish their procedures for EMS self-declaration as soon as practical but not later than NLT December 31, 2004.
4. Agencies / bureaus shall include appropriate guidance to ensure that facilities desiring to participate in a

Federal or state EMS recognition program (e.g., National Environmental Performance Track, Oregon Green Permits Program, New Jersey Silver Track Program) reflect the respective requirements in their self declaration procedures.

5. Facilities or organizations that wish to self declare their EMS before agency procedures are in place may:
 - a. adopt a recognized independent review process such as third-party registration to ISO 14001 or
 - b. document the information described in protocol item1(b), (c) and (d) above and communicate that information to external parties in accordance with their EMS communication procedures.

Part 3 Attachment Z3.2. Clarification of Terms Used for Self-Declaration

This attachment provides the content of the Clarification of Terms Used for Self Declaration of Conformance to the EO 13148 Requirement for EMS Implementation as issued by USEPA in October 2004.

The purpose of this guidance is to provide clarification and consistency on the use of terms for describing the status of self declaration of conformance with the EO 13148 requirement for an EMS at appropriate Federal facilities. The September 10, 2003 Self Declaration Protocol, paragraph 1(b) uses the terms "internal evaluations" as well as "independent reviews" and calls for each agency to determine the proper implementation of these procedures. When reporting self declaration, facilities or organizations are requested to provide the basis for the conclusion regarding self declaration. That is, whether the declaration is made based on an internal evaluation from a first party audit, an independent review from an external, second party audit or an independent review from an external, third party audit. These terms are described below.

Internal evaluations: First party audits are EMS audits conducted by the participants within the scope of the EMS under consideration. An internal audit is required by the ISO 14001 standard and is an accepted part of any EMS framework. It serves the primary purpose of ensuring the EMS is functioning properly. In addition, information from this audit is used to correct non-conformance with the selected EMS framework and is part of the suite of information provided to management as part of the formal management review process. First party audits may be conducted by those implementing the EMS or by others who will then provide the relevant results of the audit to the EMS team for their use as an internal audit.

Independent reviews: External, second party audits are EMS audits conducted by reviewers from outside the scope of the EMS in question. The purpose of an external, second party audit is to allow an unbiased and objective review of the EMS to determine if it conforms to the appropriate/selected EMS framework and reflects the EMS in question. While second part audits are conducted by those outside the control or scope of the EMS, these audits may be conducted by the same organization as the parent organization of the EMS in question. For example, a qualified agency headquarters audit team may review the EMS of a facility within that agency or qualified auditors from one facility from a given agency may audit the EMS of another facility within that agency. In addition, this audit may be conducted by a qualified outside party such as a consultant/contractor or by some other unbiased party such as individuals from a state or federal voluntary program or someone from another federal organization. The qualifications for those conducting second party independent reviews will be defined by each agency's self declaration protocol.

Independent reviews: External, third party ISO audits are conducted by ANSI-RAB accredited, independent registrar. These audits are formal, sanctioned audits conducted according to established ISO guidance to determine conformance with the ISO 14001 EMS Standard for those facilities that elect to use that Standard. A successful audit by a third party ISO auditor, will result in the facility or organization being fully certified to the ISO 14001 EMS Standard and receiving a certificate stating conformance. The qualifications for these auditors are defined by ISO and ANSI-RAB. It is noted that third party ISO audits are not required by the EO.

Part 3 Attachment Z3.3. Sample Format Of EMS Self-Declaration

This attachment provides a sample format for a written statement of self-declaration.

(Use Center Letter-head and scan actual signed form/letter for possible display on Center web site)

Date:

To whom it may concern:

Subject: Status of Environmental Management System (EMS) at

(commonly used Center name)

As the Director (insert correct Position / Title if on behalf of a Component Facility) of the (NASA Center), I have determined that (insert appropriate facility name[s] as listed by NASA Environmental Management Division for reporting purposes to EPA) has an environmental management system(s) that is in place and is viable.

Furthermore, I confirm that I, and senior management, have reviewed the environmental management system for conformance with NASA Procedural EMS Requirements and Center EMS requirements.

The determination that the environmental management system(s) is in place and is viable, has included consideration of the results of the following assessment(s) (insert as appropriate, the dates of the most recent independent self-declaration assessment or most recent internal EMS review(s)).

Signed

Name, Title

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